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**CH2MHILL**

November 1, 2006  
264204.PC.70/MIPC.C224E

Ms. Paula Bisson  
U.S. Environmental Protection Agency  
75 Hawthorne Street, CMD-4-2  
San Francisco, California 94105

Subject: Notification Regarding Self-implementing On-site Cleanup and Disposal of  
Polychlorinated Biphenyl Remediation Waste at PCB Site Building 386 AL#01 in  
Investigation Area C2, Eastern Early Transfer Parcel, Lennar Mare Island, Vallejo,  
California

Dear Ms. Bisson:

CH2M HILL prepared this letter in compliance with the Consent Agreement and Final Order between United States Environmental Protection Agency (USEPA) and the United States Department of the Navy (Navy), with the City of Vallejo and Lennar Mare Island, LLC (LMI), as interveners (USEPA et al. 2001). The Consent Agreement and Final Order set forth the polychlorinated biphenyl (PCB)-related requirements that must be met to satisfy the Toxic Substances Control Act (TSCA) for the Eastern Early Transfer Parcel of Mare Island.

## **Background**

Using visual site surveys and review of historical records, building closure reports, and databases of electrical equipment, the Navy identified PCB sites where PCB-containing equipment was located, PCB spills were documented, or contamination was suspected because of building history or visible stains (Tetra Tech Environmental Management, Inc. [TtEMI] 1998). Navy personnel from Supervisor of Shipbuilding, Conversion and Repair, Portsmouth, Virginia, Environmental Detachment (SSPORTS) conducted interim PCB assessments and performed cleanup actions (e.g., washing, scabbling, and excavation) in accordance with technical work documents (TWDs), where necessary. Following the SSSPORTS interim PCB assessments and any cleanup actions, TtEMI personnel collected samples either to confirm SSSPORTS findings that no cleanup was necessary or to determine the effectiveness of the cleanup actions.

Building 386, located in Investigation Area C2, is east of Azuar Drive (formerly Cedar Avenue), south of Bagley (formerly 14<sup>th</sup>) Street, and west of Railroad Avenue (Figure 1). Building 386 was constructed in the early to mid-1920s as part of a single superstructure (with Buildings 388, 390, and 382). Building 386 was used as a metalworking facility and

much of the former metalworking equipment remains in place. Although adjacent Buildings 388, 390, and 382 have been leased to XKT, Building 386 is not currently leased and is in an area designated for industrial use, according to *Preliminary Land Use Plan* (SWA Group 2000).

PCB Site AL#01 is associated with Building 386 and is listed in the Consent Agreement between LMI, the City of Vallejo, and the California Environmental Protection Agency, Department of Toxic Substances Control, signed April 16, 2001 (LMI et al. 2001). Site descriptions and sample location figures for PCB Site Building 386 AL#01 were provided in the *Final Basewide Polychlorinated Biphenyl Confirmation Sampling Summary Report* (TtEMI 1998) in the section for Parcel 05-A. PCB Site Building 386 AL#01 is addressed in this letter.

In accordance with the provisions of TSCA, and as stated in Title 40, Code of Federal Regulations (CFR), Part 761.61(a)(3), notification is required at least 30 days before the start of a cleanup action at a PCB site. This letter provides the required notification for site cleanup at PCB Site Building 386 AL#01. This cleanup will be performed in accordance with 40 CFR 761.61(a) – self-implementing, on-site cleanup and disposal of PCB remediation waste. This notification includes the nature, location, and extent of PCB contamination; a summary of previous sampling and cleanup actions; a cleanup plan to address remaining PCB concentrations; and certification that sampling plans and sampling analysis procedures used to characterize this site are on file and available for USEPA inspection.

#### **Nature, Location, and Extent of Contamination – 40 CFR 761.61 (a)(3)(i)(A)**

PCB Site Building 386 AL#01, formerly used as a metalworking facility, occupies the entire first floor of Building 386 (Figure 1). As part of an interim assessment in August 1996, SSPTS collected 34 wipe samples (6225-0028 through 6225-0042, 6225-0055 through 6225-0057, 6218-0244 through 6218-0252, and 6218-0262 through 6218-0269) and 55 solid samples (6225-0010 through 6225-0027, 6225-0046, 6225-0047, 6225-0064 through 6225-0073, 6225-0244 through 6225-0259, and 6218-0253 through 6218-0261) from stain-specific locations on the floor of the building (SSPTS 1996a) (Table 1). PCBs were detected above laboratory reporting limits at 5 of the 34 wipe sample locations, with results ranging from 6.6 (6225-0056) to 507 micrograms per 100 square centimeters ( $\mu\text{g}/100\text{ cm}^2$ ) (6218-0266), and at 17 of the 55 solid sample locations, with results ranging from 1.4 (6225-0066) to 11.2 milligrams per kilogram ( $\text{mg}/\text{kg}$ ) (6225-0255).

#### **Previous Sampling Procedures, Cleanup Actions, and Results – 40 CFR 761.61 (a)(3)(i)(B)**

On November 5, 1996, SSPTS issued TWD 96-1370 to remediate four floor areas where PCBs were detected above  $10\text{ }\mu\text{g}/100\text{ cm}^2$  (SSPTS 1996b). This remediation consisted of washing three steel-plate floor areas and one concrete floor area. A 4- by 4-foot concrete floor area was washed around sample location 6218-0245 ( $15\text{ }\mu\text{g}/100\text{ cm}^2$ ) in the northwest corner of the building (Figure 2). Three adjacent steel-plate floor areas in the north-central

portion of the building were washed around sample locations 6218-0264 (63 µg/100 cm<sup>2</sup>), 6218-0265 (20 µg/100 cm<sup>2</sup>), and 6218-0266 (507 µg/100 cm<sup>2</sup>) (Figure 2). Following this cleanup action, SSPTS personnel collected five verification wipe samples (6296-0091 through 6296-0095) on November 22, 1996, to confirm successful abatement. PCBs were not detected above the laboratory reporting limit (5 µg/100 cm<sup>2</sup>) in these samples (SSPTS 1996b).

On July 10, 1997, TtEMI personnel collected two concrete samples (PC1732 and PC1733) and four asphalt samples (PC1731, PC1736, PC1737, and PC1740) at PCB Site Building 386 AL#01 from oil-stained areas. The only detected PCB concentration that exceeded 1 mg/kg was in concrete sample PC1734 (2.6 mg/kg) (Table 1).

In September 1997, as part of an Installation Restoration Program site investigation, three geoprobe borings were advanced and five soil samples (B386B001 through B386B003) were collected and analyzed for PCBs. PCBs were not detected in these soil samples above the respective laboratory reporting limits (Table 1).

### **Location and Extent of Contaminated Area – 40 CFR 761.61 (a)(3)(i)(C)**

The sample results indicate that the floor inside PCB Site Building 386 AL#01 contains PCB concentrations greater than cleanup action goals. PCB concentrations in 17 solid samples ranged from 1.4 (6225-0066) to 11.2 mg/kg (6225-0255), and one concrete sample resulted in a concentration of 2.6 mg/kg (PC1734). These results demonstrate the need for additional cleanup actions to achieve a remaining PCB concentration less than or equal to 1.0 mg/kg.

### **Cleanup Plan – 40 CFR 761.61 (a)(3)(i)(D)**

Previous sample locations and PCB concentrations for PCB Site Building 386 AL#01 are presented on Figure 2. Because residual PCB concentrations exceed the cleanup goal of 1.0 mg/kg, additional cleanup actions are necessary. The proposed actions at PCB Site Building 386 AL#01 will include the removal of 18 distinct areas of floor where PCB concentrations have been detected above cleanup action goals (Figure 3).

The 18 proposed removal areas, approximately 5 by 5 feet each, surround the following PCB samples: 6218-0260, 6218-0261, 6225-0013, 6225-0255, 6225-0256, 6225-0247, 6225-0251, 6225-0017, 6225-0064, 6225-0065, 6225-0066, 6225-0067, 6225-0071, 6225-0019, 6225-0024, 6225-0070, 6218-0254, and PC1734 (Figure 3). Four discrete verification samples will be collected from each removal area based on a 3-foot (approximately 1-meter) grid. Approximately 6 inches of concrete and/or asphalt will be removed from each area.

These cleanup actions will be performed in accordance with the *Final Interim Removal Action Work Plan for Indoor Polychlorinated Biphenyl Sites in the Eastern Early Transfer Parcel* (CH2M HILL 2006) and 40 CFR 761.61(a). Samples will be analyzed in accordance with the *Quality Assurance Project Plan* (CH2M HILL 2001) using USEPA Method SW8082. Health and safety will be maintained in accordance with the *Health and Safety Plan for PCB Site Sampling and Remediation* (Appendix A to the *Draft Polychlorinated Biphenyl Work Plan*;

CH2M HILL 2002). Standard operating procedures (SOP) for the fieldwork and issues regarding site security, site access, permits and notifications, site restoration, and site demobilization were addressed in the *Final Interim Removal Action Work Plan for Indoor Polychlorinated Biphenyl Sites in the Eastern Early Transfer Parcel*.

Considering the initial PCB concentrations detected in samples collected from this site, PCB-containing wastes generated from cleanup activities will likely be disposed of offsite in a Class II landfill. However, final disposition of the waste will be determined using the results of waste characterization samples. PCB waste will be managed in accordance with CH2M HILL Health, Safety, and the Environmental SOP 82 (HSE-82). This SOP was provided in the *Draft Polychlorinated Biphenyl Work Plan*.

### **Polychlorinated Biphenyl Site Closure Process**

Figure 4 illustrates the process for PCB site closure under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and TSCA. According to the *Final Polychlorinated Biphenyl Work Plan* (CH2M HILL 2003), and under CERCLA, a no further action (NFA) determination is appropriate at a PCB site if no potential source and no PCB contamination are present at the site. Even if a potential source or PCB contamination is present in machinery or building materials, NFA is appropriate under CERCLA if there has been no release of PCBs to soil or groundwater (CH2M HILL 2003). Such sites will be evaluated under TSCA for site closure in accordance with the Consent Agreement and Final Order (USEPA et. al. 2001). If there has been a known release to soil or groundwater, NFA is also appropriate if the detected PCB concentrations in soil or groundwater do not exceed the applicable preliminary remediation goal, or if results of a site-specific risk evaluation demonstrate that potential risks associated with exposure to residual PCBs are within the risk-management range generally used to determine whether cleanup is necessary

### **Certification – 40 CFR 761.61 (a)(3)(i)(E)**

Project files for PCB Site Building 386 AL#01 are maintained in the CH2M HILL office at 155 Grand Avenue, Suite 1000, in Oakland, California. Attachment 1 contains the written certification, signed by LMI (owner of the property where the cleanup site is located) and CH2M HILL (party conducting the cleanup), documenting that all sampling plans and procedures used to assess or characterize the PCB contamination at the cleanup site are on file at the above-mentioned location and are available for USEPA inspection.

### **Conclusions**

Actions will be performed at PCB Site Building 386 AL#01 to remove remaining PCB concentrations above the cleanup goal of 1.0 mg/kg. Removal actions will continue until the cleanup goal has been achieved or until it is not practical to continue with the removal (e.g., without undermining a building wall). The cleanup, planned for December 2006, will be performed in accordance with the *Final Interim Removal Action Work Plan for Indoor*

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*Polychlorinated Biphenyl Sites in the Eastern Early Transfer Parcel* (CH2M HILL 2006). The necessity for indoor air sampling will be determined following an evaluation of the verification sample data. Indoor air sampling, if required, will be performed in accordance with the *Draft Indoor Air Sampling and Analysis Plan for Polychlorinated Biphenyl Sites at Lennar Mare Island* (CH2M HILL 2005).

Please submit your approval of the self-implementing cleanup option to me at the above address or via email at Michael.Sanchez@CH2M.com within 30 calendar days of receiving this notification. If you have questions or concerns regarding this notification for PCB Site Building 386 AL#01, please contact me at 530/229-3310 or Steve Farley at 707/562-1015 extension 103.

Sincerely,

CH2M HILL



Michael Sanchez  
Project Manager



Stephen M. Farley  
Quality Control Manager

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Enclosures: Table 1, Figures 1 through 4, Attachment 1

## References

- CH2M HILL. 2001. *Quality Assurance Project Plan*. November.
- \_\_\_\_\_. 2002. *Draft Polychlorinated Biphenyl Work Plan*. August.
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\_\_\_\_\_. 1996b. *PCB Decontamination Technical Work Document (TWD). PCB-Contaminated Spill Site, Building 386 Floor Decontamination*. TWD No. 96-1370. November 5.

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**TABLE 1**  
Sample Results for PCB Site Building 386 AL#01  
PCB Sites, Lennar Mare Island, Vallejo, California

Sample Number	Sample Matrix	Sample Date	PCB Concentration <sup>a</sup>	Unit	Comments
6218-0253	Solid	08/14/96	<1.0	mg/kg	
6218-0254	Solid	08/14/96	1.8	mg/kg	Aroclor-1254
6218-0255	Solid	08/14/96	<1.0	mg/kg	
6218-0256	Solid	08/14/96	<1.0	mg/kg	
6218-0257	Solid	08/14/96	<1.0	mg/kg	
6218-0258	Solid	08/14/96	<1.0	mg/kg	
6218-0259	Solid	08/14/96	<1.0	mg/kg	
6218-0260	Solid	08/14/96	2.1	mg/kg	Aroclor-1248
6218-0261	Solid	08/14/96	6.6	mg/kg	Aroclor-1248
6225-0046	Solid	08/14/96	<5.0	mg/kg	
6225-0047	Solid	08/14/96	<1.0	mg/kg	
6225-0064	Solid	08/15/96	1.6	mg/kg	Aroclor-1254
6225-0065	Solid	08/15/96	3.4	mg/kg	Aroclor-1248
6225-0066	Solid	08/15/96	1.4	mg/kg	Aroclor-1248
6225-0067	Solid	08/15/96	2.6	mg/kg	Aroclor-1254
6225-0068	Solid	08/15/96	<1.0	mg/kg	
6225-0069	Solid	08/15/96	<1.0	mg/kg	
6225-0070	Solid	08/15/96	4.5	mg/kg	Aroclor-1248
6225-0071	Solid	08/15/96	3.2	mg/kg	Aroclor-1248
6225-0072	Solid	08/15/96	<1.0	mg/kg	
6225-0073	Solid	08/15/96	<1.0	mg/kg	
6225-0019	Solid	08/16/96	2.0	mg/kg	Aroclor-1254
6225-0020	Solid	08/16/96	<1.0	mg/kg	
6225-0021	Solid	08/16/96	<1.0	mg/kg	
6225-0022	Solid	08/16/96	<1.0	mg/kg	
6225-0023	Solid	08/16/96	<1.0	mg/kg	
6225-0024	Solid	08/16/96	1.6	mg/kg	Aroclor-1248
6225-0025	Solid	08/16/96	<1.0	mg/kg	
6225-0026	Solid	08/16/96	<1.0	mg/kg	
6225-0027	Solid	08/16/96	<1.0	mg/kg	
6225-0010	Solid	08/19/96	<1.0	mg/kg	
6225-0011	Solid	08/19/96	<1.0	mg/kg	
6225-0012	Solid	08/19/96	<1.0	mg/kg	
6225-0013	Solid	08/19/96	5.0	mg/kg	Aroclor-1254
6225-0014	Solid	08/19/96	<5.0	mg/kg	

**TABLE 1**

Sample Results for PCB Site Building 386 AL#01  
*PCB Sites, Lennar Mare Island, Vallejo, California*

Sample Number	Sample Matrix	Sample Date	PCB Concentration <sup>a</sup>	Unit	Comments
6225-0015	Solid	08/19/96	<5.0	mg/kg	
6225-0016	Solid	08/19/96	<5.0	mg/kg	
6225-0017	Solid	08/19/96	10.1	mg/kg	Aroclor-1254
6225-0018	Solid	08/19/96	<5.0	mg/kg	
6225-0244	Solid	08/19/96	<5.0	mg/kg	
6225-0245	Solid	08/19/96	<5.0	mg/kg	
6225-0246	Solid	08/19/96	<5.0	mg/kg	
6225-0247	Solid	08/19/96	6.9	mg/kg	Aroclor-1254
6225-0248	Solid	08/19/96	<5.0	mg/kg	
6225-0249	Solid	08/19/96	<5.0	mg/kg	
6225-0250	Solid	08/19/96	<1.0	mg/kg	
6225-0251	Solid	08/19/96	1.5	mg/kg	Aroclor-1254
6225-0252	Solid	08/19/96	<5.0	mg/kg	
6225-0253	Solid	08/19/96	<5.0	mg/kg	
6225-0254	Solid	08/19/96	<5.0	mg/kg	
6225-0255	Solid	08/19/96	11.2	mg/kg	Aroclor-1260
6225-0256	Solid	08/19/96	3.4	mg/kg	Aroclor-1260
6225-0257	Solid	08/19/96	<1.0	mg/kg	
6225-0258	Solid	08/19/96	<5.0	mg/kg	
6225-0259	Solid	08/19/96	<5.0	mg/kg	
6225-0055	Wipe	08/21/96	<5.0	µg/100 cm <sup>2</sup>	
6225-0056	Wipe	08/21/96	6.6	µg/100 cm <sup>2</sup>	Aroclor-1260
6225-0057	Wipe	08/21/96	<5.0	µg/100 cm <sup>2</sup>	
6218-0244	Wipe	08/23/96	<5.0	µg/100 cm <sup>2</sup>	
6218-0245	Wipe of Concrete Floor	08/23/96	15.0	µg/100 cm <sup>2</sup>	Aroclor-1260; removed per TWD 96-1370
6218-0246	Wipe	08/23/96	<5.0	µg/100 cm <sup>2</sup>	
6218-0247	Wipe	08/23/96	<5.0	µg/100 cm <sup>2</sup>	
6218-0248	Wipe	08/23/96	<5.0	µg/100 cm <sup>2</sup>	
6218-0249	Wipe	08/23/96	<5.0	µg/100 cm <sup>2</sup>	
6218-0250	Wipe	08/23/96	<5.0	µg/100 cm <sup>2</sup>	
6218-0251	Wipe	08/23/96	<5.0	µg/100 cm <sup>2</sup>	
6218-0252	Wipe	08/23/96	<5.0	µg/100 cm <sup>2</sup>	
6218-0262	Wipe	08/23/96	<5.0	µg/100 cm <sup>2</sup>	
6218-0263	Wipe	08/23/96	<5.0	µg/100 cm <sup>2</sup>	

**TABLE 1**

Sample Results for PCB Site Building 386 AL#01  
 PCB Sites, Lennar Mare Island, Vallejo, California

Sample Number	Sample Matrix	Sample Date	PCB Concentration <sup>a</sup>	Unit	Comments
6218-0264	Wipe of Steel Plate on Floor	08/23/96	63.0	µg/100 cm <sup>2</sup>	Aroclor-1242; removed per TWD 96-1370
6218-0265	Wipe of Steel Plate on Floor	08/23/96	20.0	µg/100 cm <sup>2</sup>	Aroclor-1254; removed per TWD 96-1370
6218-0266	Wipe of Steel Plate on Floor	08/23/96	507.0	µg/100 cm <sup>2</sup>	Aroclor-1254; removed per TWD 96-1370
6218-0267	Wipe	08/23/96	<5.0	µg/100 cm <sup>2</sup>	
6218-0268	Wipe	08/23/96	<5.0	µg/100 cm <sup>2</sup>	
6218-0269	Wipe	08/23/96	<5.0	µg/100 cm <sup>2</sup>	
6225-0028	Wipe	08/27/96	<5.0	µg/100 cm <sup>2</sup>	
6225-0029	Wipe	08/27/96	<5.0	µg/100 cm <sup>2</sup>	
6225-0030	Wipe	08/27/96	<5.0	µg/100 cm <sup>2</sup>	
6225-0031	Wipe	08/27/96	<5.0	µg/100 cm <sup>2</sup>	
6225-0032	Wipe	08/27/96	<5.0	µg/100 cm <sup>2</sup>	
6225-0033	Wipe	08/27/96	<5.0	µg/100 cm <sup>2</sup>	
6225-0034	Wipe	08/27/96	<5.0	µg/100 cm <sup>2</sup>	
6225-0035	Wipe	08/27/96	<5.0	µg/100 cm <sup>2</sup>	
6225-0037	Wipe	08/27/96	<5.0	µg/100 cm <sup>2</sup>	
6225-0038	Wipe	08/27/96	<5.0	µg/100 cm <sup>2</sup>	
6225-0039	Wipe	08/27/96	<5.0	µg/100 cm <sup>2</sup>	
6225-0040	Wipe	08/27/96	<5.0	µg/100 cm <sup>2</sup>	
6225-0041	Wipe	08/27/96	<5.0	µg/100 cm <sup>2</sup>	
6225-0042	Wipe	08/27/96	<5.0	µg/100 cm <sup>2</sup>	
6296-0091	Wipe	11/22/96	<5.0	µg/100 cm <sup>2</sup>	TWD verification sample
6296-0092	Wipe	11/22/96	<5.0	µg/100 cm <sup>2</sup>	TWD verification sample
6296-0093	Wipe	11/22/96	<5.0	µg/100 cm <sup>2</sup>	TWD verification sample
6296-0094	Wipe	11/22/96	<5.0	µg/100 cm <sup>2</sup>	TWD verification sample
6296-0095	Wipe	11/22/96	<5.0	µg/100 cm <sup>2</sup>	TWD verification sample
PC1731	Asphalt	07/10/97	0.194 J	mg/kg	0.16 J mg/kg Aroclor-1254; 0.034 J mg/kg Aroclor-1260
PC1732	Concrete	07/10/97	0.223 J	mg/kg	0.18 J mg/kg Aroclor-1254; 0.043 J mg/kg Aroclor-1260
PC1734	Concrete	07/10/97	2.6	mg/kg	Aroclor-1254
PC1736	Asphalt	07/10/97	<0.067	mg/kg	
PC1737	Asphalt	07/10/97	0.092 J	mg/kg	Aroclor-1254
PC1740	Asphalt	07/10/97	0.23	mg/kg	Aroclor-1260

**TABLE 1**

Sample Results for PCB Site Building 386 AL#01  
PCB Sites, Lennar Mare Island, Vallejo, California

Sample Number	Sample Matrix	Sample Date	PCB Concentration <sup>a</sup>	Unit	Comments
B386GB001	Soil	09/23/97	<0.034	mg/kg	3.5 to 4.0 feet bgs
B386GB002	Soil	09/23/97	<0.022	mg/kg	3.5 to 4.0 feet bgs
B386GB002	Soil	09/23/97	<0.0086	mg/kg	11 to 11.5 feet bgs
B386GB003	Soil	09/23/97	<0.0067	mg/kg	0 to 0.5 feet bgs
B386GB003	Soil	09/23/97	<0.01	mg/kg	4.0 to 4.5 feet bgs

<sup>a</sup>Total PCB concentration unless otherwise specified in comments column.

Notes:

µg/100 cm<sup>2</sup> = micrograms per 100 square centimeters

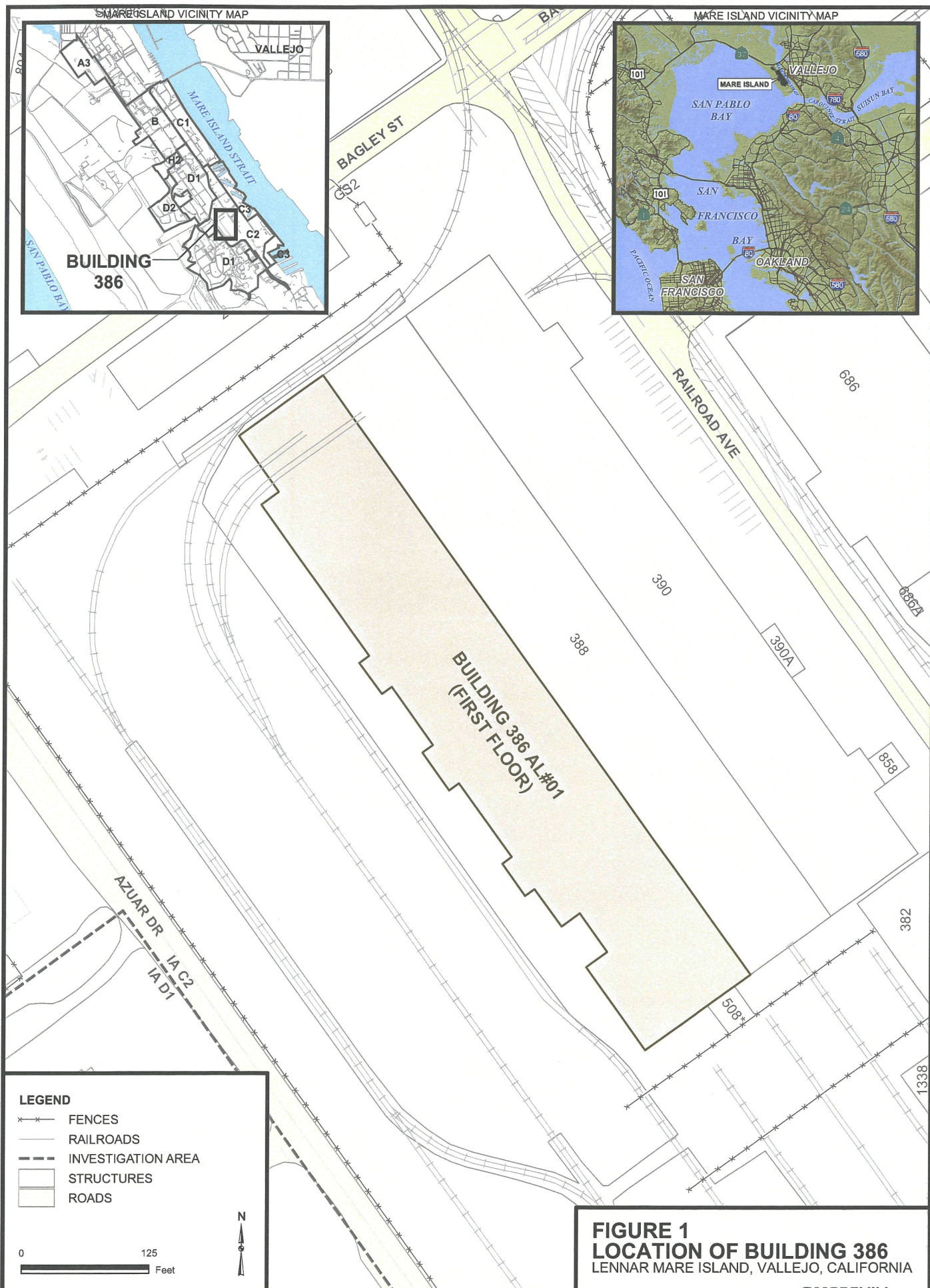
bgs = below ground surface

J = estimated concentration

mg/kg = milligrams per kilogram

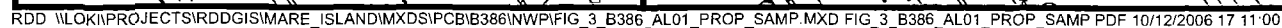
PCB = polychlorinated biphenyl

TWD = technical work document

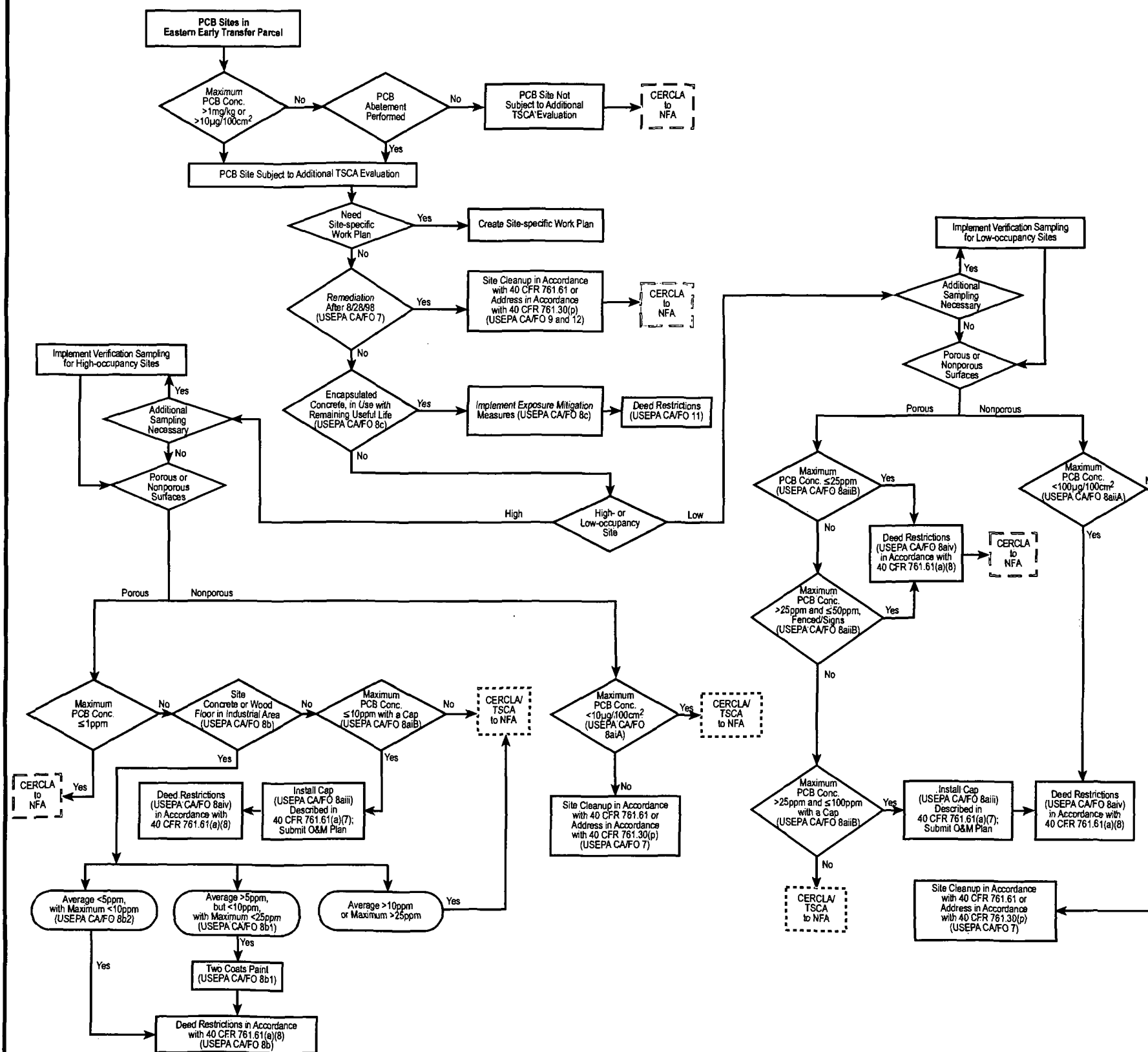












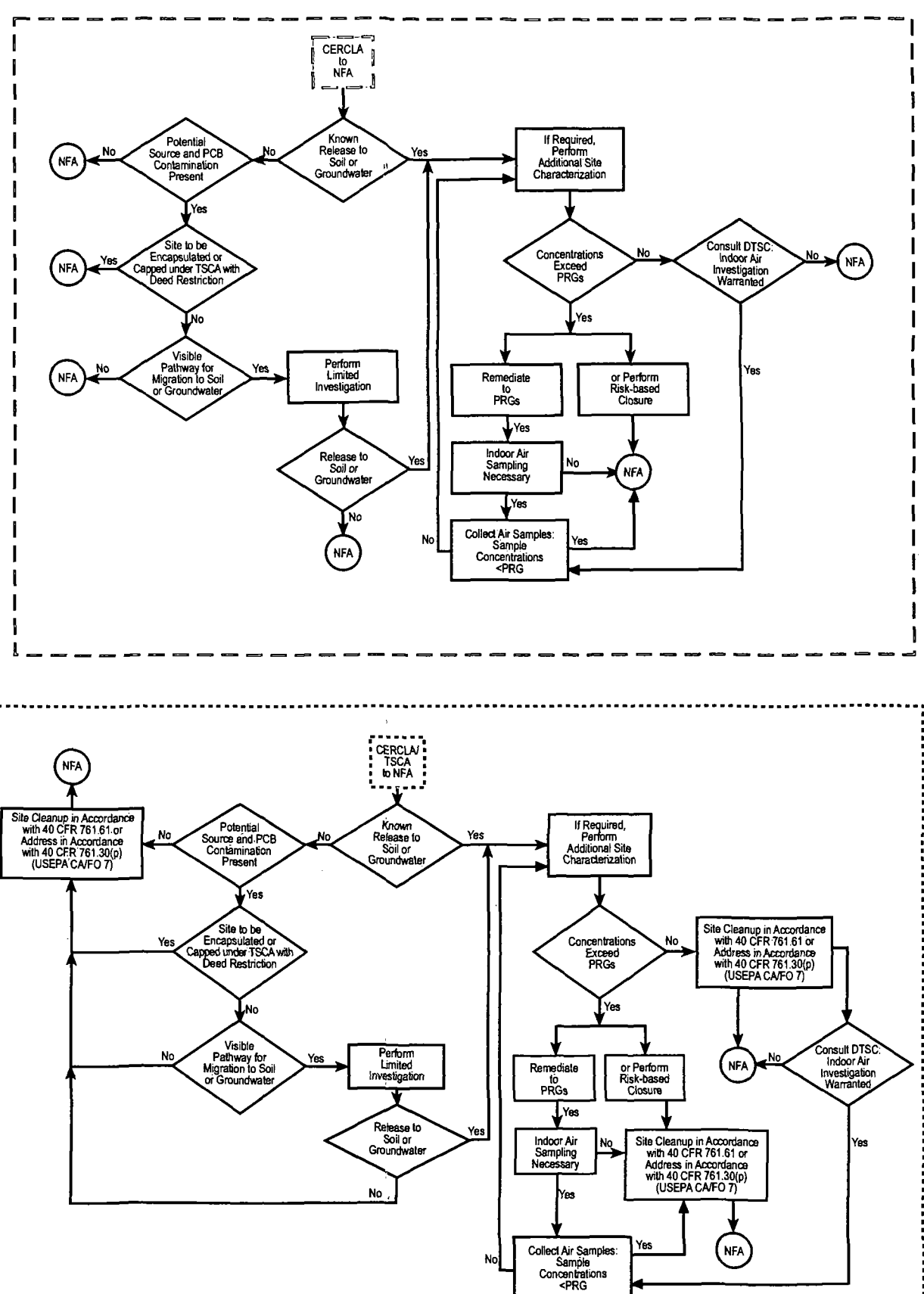
**NOTES:**

USEPA CA/FO = USEPA Consent Agreement/Final Order paragraph number

NFA = No Further Action

O&M = Operations and Maintenance

PRG = Preliminary Remediation Goal



**FIGURE 4**  
**PATH FOR PCB SITE CLOSURE**  
**BUILDING 386 AL#01**  
LENNAR MARE ISLAND, VALLEJO, CALIFORNIA

**Attachment 1**  
**Certification**

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ATTACHMENT 1

# Certification

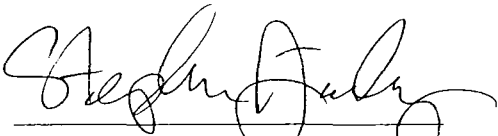
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All sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the polychlorinated biphenyl (PCB) contamination at PCB Site Building 386 AL#01 are on file at the CH2M HILL office at 155 Grand Avenue, Suite 1000, in Oakland, California. These files are available for USEPA inspection.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.



Neal Siler, Lennar Mare Island (owner of the property where the cleanup site is located)



Stephen M. Farley, P.G./CH2M HILL (party conducting the cleanup)